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June 16, 2021

Via ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Case No. 1:21-cv-02795-BMC; *LopezTalent Management LLC, and Josanne Lopez v. Laura Coates* – First Letter Motion for Adjournment on Consent of Initial Status Conference, currently set for June 30, 2021 at 2:15 p.m.

Your Honor,

This firm represents Laura Coates (“Defendant”) in the above matter. With the consent of counsel for Plaintiffs, we write to request a 30-day adjournment of the Initial Status Conference currently set for June 30, 2021 at 2:15p.m. Pursuant to Your Honor’s Individual Practice E.1., Defendant states: (a) the Initial Status Conference is currently set for June 30, 2021 at 2:15 p.m.; (b) there have been no previous requests for adjournment, and as such; (c) none have been granted or denied; (d) counsel for Plaintiffs consents to this request; (e) no other deadlines are affected, except the pre-conference submission deadlines, which would be adjusted accordingly; (f) the reason for the adjournment is that Defendant's responsive pleading is not yet due and the adjournment will allow sufficient time for the formulation and service of the responsive pleading and for the parties to address the issues contained therein in the required pre-conference submissions.

In view of the foregoing, Defendant respectfully requests that the Initial Status Conference be adjourned for 30 days, and rescheduled for a date and time that is convenient for the Court.

Thank you for the Court’s kind consideration.

Respectfully submitted,
STINSON LLP

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cc: All Parties via ECF